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ULC; and People Media, Inc.*

*Caption continued on next page.*

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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11

12 IN RE GOOGLE PLAY STORE ANTITRUST  
13 LITIGATION

Case No. 3:21-md-02981-JD

14 THIS DOCUMENT RELATES TO:

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL SHOULD  
BE SEALED UNDER LOCAL RULE 79-5(f)**

15 *Epic Games, Inc. v. Google LLC et al.*,  
16 Case No. 3:20-cv-05671-JD

Judge: Hon. James Donato

17 *In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

18 *State of Utah et al. v. Google LLC et al.*,  
19 Case No. 3:21-cv-05227-JD

20 *Match Group, LLC, et al. v. Google LLC, et al.*,  
21 Case No. 3:22-cv-02746-JD  
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Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiffs respectfully submit this interim administrative motion to consider whether another party's material should be sealed under local rule 79-5(f) with respect to Plaintiffs' Proposed Remedy re Google's Destruction of Chat Evidence and the Declaration of Lauren A. Moskowitz ("Moskowitz Decl.") and exhibits 1-33 attached thereto. The excerpts and documents at issue are sourced from documents designated by Google or Riot Games, Inc. as "CONFIDENTIAL", "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" or "NON-PARTY HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the applicable protective order. (MDL Dkt. 249.) Public redacted versions of Plaintiffs' Proposed Remedy re Google's Destruction of Chat Evidence and accompanying documents have been filed in accordance with this Court's rules. The documents and portions of documents Plaintiffs seek to temporarily file under seal are listed below:

Document	Corresponding Page and Line Number(s)
Brief	Page 4, Footnote 2, between "(“ and ”)".
Brief	Page 5, lines 2-4, between "that" and end of sentence.
Brief	Page 5, lines 4-5, between "to" and end of sentence.
Brief	Page 5, lines 6-8, between "decided" and end of sentence.
Brief	Page 5, lines 8-10, between "Google" and end of sentence.
Brief	Page 5, lines 11-12, between "2020." and the end of sentence.
Brief	Page 5, lines 21-24, between "OEMS to" and end of sentence.
Brief	Page 5 line 28, between "line of" and end of sentence.
Brief	Page 6, lines 3-4, between "whether" and end of sentence.
Brief	Page 6, lines 10-11, between "they" and end of sentence.
Brief	Page 6, lines 12-14, between "that" and end of sentence.
Brief	Page 6, lines 14-15, between "Google" and end of sentence.
Brief	Page 6, lines 16-17, between "that" and end of sentence.
Brief	Page 6, line 28 through page 7, line 1, between "for" and end of sentence.
Brief	Page 7, lines 4-5, between "as" and end of sentence.
Brief	Page 7, lines 6-7, between "and" and end of sentence.
Brief	Page 7, lines 8-10, between "(18-22)." and end of sentence.
Brief	Page 7, line 11, between "because" and end of sentence.
Brief	Page 7, lines 23-25, between "to" and end of sentence.
Brief	Page 7, lines 26-27, between "require" and "(Moskowitz".
Brief	Page 7, line 27, between "secure" and "for".
Brief	Page 7, line 27-28, between "Google" and "(id.".
Brief	Page 8, lines 1-2, between "Samsung" and "(Moskowitz"
Brief	Page 8, line 3, between "not" and end of sentence.
Brief	Page 8, lines 5-6, between "he" and end of sentence.

	Document	Corresponding Page and Line Number(s)
1	Brief	Page 8, lines 7-8, between “Google” and end of sentence.
2	Brief	Page 8, lines 10-11, between “be” and end of sentence.
3	Brief	Page 8, lines 16-17, between “millions,” and “;why”.
	Brief	Page 8, lines 18-19, between “current” and “that”.
4	Brief	Page 9, lines 9-11, between “that” and end of sentence.
	Brief	Page 9, lines 12-13, between “have” and end of sentence.
5	Brief	Page 9, line 14-16, between “9919.)” and end of paragraph.
6	Brief	Page 10, lines 12-14, between “376-8.)” and end of paragraph.
	Brief	Page 10, lines 16-17, between “with” and end of sentence.
7	Brief	Page 10, lines 18-20, between “-8691.)” and end of paragraph.
	Brief	Page 10, line 22, between “in” and end of sentence.
8	Brief	Page 10, lines 22-25, between “179:1-7.)” and end of paragraph.
9	Brief	Page 12, line 5, between “as” and “and”.
10	Brief	Page 12, lines 5-7, between “that” and end of sentence.
	Brief	Page 12, lines 22-23, between “it” and end of sentence.
11	Brief	Page 13, lines 25-26, between “and Apple” and “—to quote”.
12	Brief	Page 13, lines 26-27, between “executive—” and end of sentence.
13	Brief	Page 13, line 28, entire line.
	Brief	Page 14, lines 1-2, between “that” and end of sentence.
14	Brief	Page 14, line 8, between “that” and end of sentence.
	Brief	Page 16, lines 17-18, between “Chat,” and end of sentence.
15	Brief	Page 16, lines 19-20, between “that” and end of sentence.
16	Brief	Page 16, lines 22-23, between “that” and end of sentence.
	Brief	Page 16, lines 24-25, between employee and end of sentence.
17	Brief	Page 16, lines 26-27, between “referenced a” and end of sentence.
18	Brief	Page 16, line 28 and page 17, line 1, between “to” and end of sentence.
19	Exhibit 1	Document in its entirety.
20	Exhibit 2	Document in its entirety.
	Exhibit 3	Document in its entirety.
21	Exhibit 4	Document in its entirety.
	Exhibit 5	Document in its entirety.
22	Exhibit 6	Document in its entirety.
	Exhibit 7	Document in its entirety.
23	Exhibit 8	Document in its entirety.
24	Exhibit 9	Document in its entirety.
	Exhibit 10	Document in its entirety.
25	Exhibit 11	Document in its entirety.
	Exhibit 12	Document in its entirety.
26	Exhibit 13	Document in its entirety.
27	Exhibit 14	Document in its entirety.
	Exhibit 15	Document in its entirety.
28	Exhibit 17	Document in its entirety.

Document	Corresponding Page and Line Number(s)
Exhibit 19	Document in its entirety.
Exhibit 20	Document in its entirety.
Exhibit 21	Document in its entirety.
Exhibit 22	Document in its entirety.
Exhibit 23	Document in its entirety.
Exhibit 24	Document in its entirety.
Exhibit 25	Document in its entirety.
Exhibit 26	Document in its entirety.
Exhibit 27	Document in its entirety.
Exhibit 28	Document in its entirety.
Exhibit 30	Document in its entirety.

DATED: September 21, 2023

CRAVATH, SWAINE & MOORE LLP

By: /s/ Lauren A. Moskowitz

Lauren A. Moskowitz (*pro hac vice*)  
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DATED: September 21, 2023

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10 *Rainbow, Inc., PlentyofFish Media ULC, and*  
11 *People Media, Inc.*  
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**E-FILING ATTESTATION**

I, Bahadur S. Khan, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Bahadur S. Khan  
Bahadur S. Khan